

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.:23-24670-CIV-LENARD/DAMIAN

SHANTEE REESE,

Plaintiff,

v.

ALORICA, INC.,
a Foreign Profit Corporation,

Defendant.

DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Defendant, Alorica, Inc. ("Alorica" or "Defendant"), by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(c), hereby files the instant Motion for Protective Order regarding Plaintiff's Notice of Setting Defendant's Rule 30(b)(6) Deposition and states as follows:

1. The deposition of Defendant's Corporate Representative is currently set for tomorrow, June 6, pursuant to a notice of taking deposition Plaintiff served May 30, 2024.
2. Undersigned counsel contacted Plaintiff's counsel Monday, June 4, requesting that the deposition be re-set to the week of June 17, 2024 due to the fact that a different individual than expected will be the corporate representative designee, and that individual needs time to prepare for the deposition and get familiar with the facts at issue in this litigation order to speak for the corporation at the deposition.
3. Plaintiff's counsel has indicated he is indeed available to conduct the deposition on June 20, and undersigned counsel has requested that Plaintiff counsel re-set the deposition for that date.

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4. Plaintiff's counsel, however, refuses to reschedule the deposition and claims that he will go forward with the deposition as scheduled.

5. The discovery cutoff in this case is not until July 26, 2024, and thus there are approximately five (5) weeks still left in the discovery period if the deposition were to be taken June 20, or another date the week of June 17, 2024.

6. Undersigned counsel has conferred with Plaintiff's counsel regarding this issue and the Parties have not been able to come to a consensus.

7. This Motion is made in good faith and not for purposes of delay. Moreover, no party will be prejudiced by the granting of this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's Motion for Protective Order and direct the Parties to coordinate the Rule 30(b)(6) deposition to be taken on June 20, or sometime the week of June 17, 2024.

Dated: June 5, 2024

Respectfully submitted,

s/ Dion Cassata
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Counsel for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 5, 2024, a true and correct copy of the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record.

s/ *Dion J. Cassata*
Dion J. Cassata, Esq.

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